

Petro-Canada Lubricants

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August 15, 2005

File # 050175

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW Room 4008
South. Ag. Stop 0268
Washington, DC 20250

Subject: National Organic Program, Sunset Review, Docket number TM-04-07

Dear Mr. Neal:

In response to the USDA's request for public comment regarding the sunset review for substances allowed or prohibited in the production of organic agricultural products, Petro-Canada offers the following comments.

Petro-Canada manufactures and distributes an EPA-registered horticultural spray oil product used to control insects, mites and diseases on a wide variety of crops, including almond, apple, apricot, avocado, banana, citrus, cherry, citrus, coffee, corn (field and sweet), fig, grape, hops, kiwi, mango, nectarine, nuts, papaya, peach, pear, pineapple, pistachio, plum, strawberry, sugar beets and many vegetables. The product registered by EPA for use in organic production, PureSpray™ Green (EPA Reg. No. 69526-9), is used by organic growers to protect many high-value crops from insects and fungal disease. This product has become a valuable tool in integrated pest management programs. The product label carries the "For Organic Production" statement and the Organic Materials Review Institute (OMRI) logo.

PureSpray™ Green is **not** the common horticultural spray oil long used in conventional agriculture. Instead this product is manufactured to contain extremely low aromatic hydrocarbons (in the low ppb range) and very high unsulfonated residue (greater than 99.0%). Therefore the active ingredient in this product greatly exceeds the definition of such oils as given in the NOP National List at 7 CFR § 205.601(e)(6) for insecticide use and § 205.601(i)(6) for plant disease control. The other (inert) ingredients in this product are selected from EPA's list of Inerts of Minimal Concern (List 4) as required by



the NOP National List at 7 CFR § 205.601(m)(1). Therefore, the product is compatible with organic practice, and not harmful to human health or the environment. There are very few synthetic insecticides/fungicides that meet these criteria and thus Petro-Canada strongly believes their use under the National Organic Program should be continued.

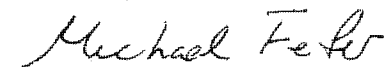
The national list of synthetic substances allowed for use in organic crop production (at 7 CFR § 205.601(e)(6) for insecticide use and § 205.601(i)(6) for plant disease control) lists the specific exemption for horticultural spray oil as:

Oils, horticultural, narrow range oils as dormant, suffocating, and summer oils.

Petro-Canada believes these exemptions are serving the intended purpose by providing suitable products for organic production while preserving the integrity of organic agriculture. We further believe USDA should keep other similar products of lesser quality, i.e., oils with higher aromatic content and greater sulfur content, off of the National List and out of organic production. This goal can be achieved by careful review of proposed products by OMRI and the National Organic Standards Board. Additionally, the exemption for oils in the National List at 7 CFR § 205.601(e)(6) for insecticide use and § 205.601(i)(6) for plant disease control, could also be revised to more precisely define the quality of oil produced by good stewardship manufacturers such as Petro-Canada.

Thank you for your consideration.

Sincerely,



Michael Fefer, Ph.D.
Lubricants Research and Development
New Product Development
Petro-Canada

Cc: National Organic Standards Board